

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MARÍA ALSINA ORTIZ, ET. AL.	*	CIVIL NO. 98-1893 (JAG)
AND/OR THE ESTATE OF MR.	*	
ORLANDO OCASIO ALSINA	*	
COMPOSE OF MARÍA ALSINA	*	
ORTIZ	*	
	*	PLAINTIFFS DEMAND TRIAL
PLAINTIFFS	*	
	*	BY JURY
VS.	*	
	*	
MS. ZOE LABOY IN HER PERSONAL CAPACITY, JOHN DOE IN HIS PERSONAL CAPACITY AND, ET. AL.	*	
	*	
	*	
DEFENDANTS	*	
	*	

* * * * *

URGENT MOTION REQUESTING ORDER

TO THE HONORABLE COURT:

COME NOW, Plaintiffs through their undersigned attorney, and respectfully state and pray:

1. Trial is scheduled on November 28, 2005. Plaintiff needs to have present at the trial inmates that have been notified as witnesses in the case. In order that the inmates be subpoena for trial, plaintiff needs the last physical known address of each inmate, because most of them are in other locations as of this date.

2. Plaintiff hereby provides the names and last known address of each inmate.

3. In order that plaintiff could subpoena the inmates for trial, plaintiff needs the names of the specific correctional facilities, building numbers and cells in which those inmates are present or will be present during the next 40 days. Furthermore, if the inmates are not more under the custody of the Administration of Correction, then plaintiff needs the last known residential address of the inmates and the last known address of any private institution in which the inmates could be subject to their custody.

4. Plaintiff's attorney is also requesting to order the wardens, correctional employees and correctional officers to allow plaintiff's attorney to access the inmates before and during the trial, at the physical facilities in which the inmates are located, but subject to the security measures. The reason why plaintiff requests this order is so that the plaintiff could prepare her case for trial.

5. The inmates that plaintiff needs the information requested above are:

a. Felix A. Ramos Moulier
Cárcel Regional de Bayamón #5101 "2E"
Bayamón, PR
Calle 21 AA 29
Jardines de Palmarejo
Barrio San Isidro
Canovanas, P.R. 00729
Tel. 256-0556

b. Nathaniel Mojica Reyes

Carcel Regional de Guayama
Colonia Los Dolores
Carr. # 3
Interior 7710
Guayama, P.R.

- c. Javier Del Valle Llopiz
Hogar Adaptación Social de Carolina
Calle Amadeous # 8 Altos
Carolina, P.R. 00985
- d. Gilberto Rivera Rodríguez
Hogar Adaptación Social de Río Piedras
Calle Norte #64
Río Piedras, P.R. 00925
- e. Erick Diaz Davila
Hospital de Psiquiatría Correccional
Centro Médico
Río Piedras, PR
Barrio Lomas Jagua
Naranjito, P.R.
(787) 869-7079
- f. Luis López Negrón
Wackenhut PR, Inc.
Calle Final #28
Barrio Juan Sánchez, Centro Industrial Luchetti
Bayamón, P.R. 00961
- g. Carmelo Román Hernández
Hogar de Adaptación Social de Carolina
Calle Amadeos # 8 Altos
Carolina, P.R. 00985
- h. Wilson García Cueva
Hogar de Adaptación Social de Humacao
Ave. Roosevelt # 5
Humacao, P.R. 00791
- I. Edwin Rivera
Carcel Regional de Bayamón
Detrás de la Comandancia Norte de Bayamón
Carr. # 5
Bayamón, P.R.

j. Edwin Meléndez Meléndez
Carcel Regional de Bayamón
Detrás de la Comandancia Norte de Bayamón
Carr. # 5
Bayamón, P.R.

k. Javier Rodríguez Torred
Hogar de Adaptación Social de Carolina
Calle Amadeous # 8 Altos
Carolina, P.R.

6. A federal court may enjoin a state officer to refrain from future actions that violate federal law or take prospective actions to comply with constitutional mandates. *Ex Parte Young*, 209 U.S. 123(1908).

WHEREFORE, Plaintiff very respectfully requests this Honorable Court to order the Secretary of the Administration of Correction, wardens and employees of the Administration of Correction, that have available the information requested above, to notify it to attorney Glenn Carl James within the next five(5) days, at Calle Peñuelas 65-A, Hato Rey, P.R.00918. Second, to order the wardens, correctional employees and correctional officers to allow plaintiff's attorney to access the inmates before and during the trial.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY: I hereby certify that on 28 day of October, 2005 I electronically filed the foregoing with the Clerk of the Court, using CM/ECF system which will send notification of such filing: laaparicio@justicia.gobierno.pr,

r u r o r o d r i g u e z @ j u s t i c i a . g o b i e r n o . p r ,
j o e s t a d e s @ j u s t i c i a . g o b i e r n o . p r , j o s g o n z a l e z @ j u s t i c i a . g o b . p r , and
l a v y a p a r i c i o @ y a h o o . c o m .

In San Juan, Puerto Rico, this 28 day of October, 2005.

s/ Glenn Carl James
Glenn Carl James
Attorney for Plaintiffs
USDC-PR 207,706
JAMES LAW OFFICE
PMB 501
1353 Rd. 19
Guaynabo, PR 00966-2700
Tel. (787) 763-2888
Fax: (787) 763-2881
E-mail:
jameslawoffices@centennialpr.net